HAZARDOUS WASTE (BIENNIAL) REPORT DEADLINES

Under Part 111, Hazardous Waste Management, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA); the corresponding requirements under Subtitle C of the federal Resource Conservation and Recovery Act of 1976, as amended (RCRA); and any administrative rules or regulations promulgated pursuant to these acts. Rule 304 states, "(d) Submit 1 copy *{manifest}* to the director or his or her designee, which shall be postmarked not later than 10 days after the month in which shipment was made." and Rule 608, states, "(f) Return a copy of the manifest to the director or his or her designee within a period of 10 days after the end of the month in which the waste was received."

These deadlines directly impact when staff of the Michigan Department of Environmental Quality Division, Waste and Hazardous Materials Division (MDEQ-WHMD), can generate and mail the biennial report since a large portion of the report is based on manifest data. Normally, it can take up to six weeks to process manifests after they are submitted to the MDEQ-WHMD. The pre-populated report packets are generated and mailed the last week of January through the first week of February. This is with the understanding that if manifests for December shipments were not received by the MDEQ-WHMD immediately after the January 10th deadline, the pre-populated report may not be complete and the generator will have to enter the data manually.

The MDEQ-WHMD cannot change the submittal deadline of March 1st, as it is a Federal standard and authorized states may not be less stringent. Given the regulatory submittal date and the deadlines posted by the US Environmental Protection Agency (EPA) for States to submit the data, the following is the approximate schedule the MDEQ-WHMD staff will follow to generate and process the reports for any hazardous waste generated or managed between January 1st and December 31st of each odd numbered year.

End of the first week in February (even numbered year):

The MDEQ-WHMD will generate and mail a pre-populated report packet to any:

- Site that met the regulatory requirements of a large quantity generator of hazardous waste for one or more months in the preceding odd numbered year, or
- A treatment, storage, or disposal facility for hazardous waste received and generated in the preceding odd numbered year.

March 1st (even numbered year):

Biennial reports are required to be completed, signed, and returned to the MDEQ-WHMD.

Mid-April (even numbered year):

Staff of the MDEQ-WHMD will determine what sites have not returned a completed and signed report and said sites will be notified.

Mid-June (even numbered year):

Staff of the MDEQ-WHMD will have all data submitted entered into the states data system. Queries will be run to verify the data will pass quality checks. Any site that has not submitted a complete and signed report will be notified.

End of June (even numbered year):

Staff of the MDEQ-WHMD will complete the upload of the preliminary data to the US Environmental Protection Agency (EPA).

July-August (even numbered year):
Staff of the MDEQ-WHMD will continue to make any data corrections where needed and run logic check reports. Any site that has not submitted a complete report will be further notified.

Mid-October (even numbered year):

Staff of the MDEQ-WHMD will begin final upload of data to the EPA.